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October 31, 2006

Ms. Kelly Sherman
U.S. EPA
Office of Pesticide Programs
Document Processing Desk
Room S-4900
One Potomac Yard
2777 S. Crystal Drive
Arlington, VA 22202

Dear Kelly,

There has been considerable activity these past couple of days among the rodenticide stakeholders in an effort to propose a unified position on mitigation. This position has already been communicated to the EPA via the Rodenticide Registrants Task Force. The National Pest Management Association will do likewise. Bell Laboratories, Inc. supports the position of these groups. Because I feel that it has not been fully addressed or considered, I would like to reinforce the importance of those engaged in farming operations.

Farmers are businessmen and wear many hats due to the nature of their business. They are usually engaged in a wide array of activities in running their operation. They are usually do-it-yourself minded and don't enlist in professional for hire services unless it is absolutely essential. This is no different when it comes to rodent control. Rodents are an ongoing problem on nearly all farms, including poultry, dairy, grain, vegetable, fruit, cotton and seed operations, just to name a few. Some farm operations include on-site food processing and packaging which are required to be rodent free for obvious contamination concerns. Rodents infringe on all of these types of operations in a very significant way.

Farmers don't purchase their rodenticides from Wal-Mart, Home Depot and many other chains of this type like urbanites and suburbanites are accustomed to doing. Their purchases are at farm stores where they buy in larger volumes because they have so much to tend to. They also do it for cost-savings, convenience and one-stop shopping for other items that may be needed for their farm operation. My opinion is that farmers have done a remarkable job in their rodent control efforts. While many farmers have some type of pesticide applicators license, there are many more that do not have such a license. They are accustomed to buying their product at the farm store and then simply placing the product where necessary according to the label directions given. I see them as being very experienced and responsible and place them in a category of someone who is required to use rodenticides as part of their job and running their business. They are in a unique class, different from professional pest control operators and different from the urban consumer.

In the mitigation measures offered up by industry, the farmer is listed alongside the certified applicator so that he/she will have access to those products that have professional labels and can use these products outdoors as well as indoors. Bell Laboratories, Inc. and the rest of the industry supports this as illustrated in their mitigation proposal. I felt it important elaborate on the importance of the farming operation segment and ask that you support their efforts by allowing continued access to professional products for rodent control.

Sincerely,

A handwritten signature in black ink, appearing to read "John Lublinkhof". The signature is fluid and cursive, with the first name "John" being more prominent.

John Lublinkhof, Ph.D.
Director of Regulatory Affairs

Cc: Dr. Debra Edwards
Ms. Susan Lewis

